

Summary of 2/7/18 Monthly Meeting  
with Pre-RD AOC Group and EPA Region 10

Pre-Remedial Design Investigation (PDI) for Portland Harbor Superfund Site

EPA Representatives: Davis Zhen, Stephanie Ebright, Lori Cora, Eva DeMaria, Becky Chu, Howard Young (CDM Smith), Scott Coffey (CDM Smith)

Pre-RD AOC Group: Mat Cusma, Howard Cumberland, Tina Hein, Debbie Deetz Silva, Linda Baker, Ken Tyrrell, Anne Fitzpatrick, Jenny Pretare, Luke Smith, Keith Kroeger (phone), Betsy Ruffle (phone), Karen Traeger (by phone), Fred Wolf (phone), Loren Dunn (phone)

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Summary

- First Meeting: Since this was the first monthly meeting, it was beneficial to have a larger group meet in person: future meetings can be phone calls with a smaller group of participants, as needed depending on the topic.
- Schedule: EPA expects to meet the AOC deadline for returning comments on the draft project plans (assuming no government shutdowns). EPA expects to provide the Group with their comments on the QAPP and DQMP by next week (week of February 12, 2018). Notable schedule constraints were discussed and included critical path items for approval, so we can be in the field end of February (bathymetry), March (surface water and sediment trap sampling), and April (fish acoustic tracking). Critical path items include: approval of the programmatic plans (DQMP, QAPP, HASP), the bathymetry FSP, the surface water FSP, feedback on acoustic fish tracking design (8-week lead time to fabricate acoustic receivers and mounts), and feedback on sediment trap design (4 weeks for fabrication of the sediment traps).
- Technical Discussion: Bathymetry FSP and HASP will be revised to address EPA comments, except where discussed below. Survey monuments will be provided to EPA as an addendum, after EPA approval of the bathymetry FSP. The survey elevation of +7.8 ft CRD will be changed to +13.0 ft NAVD88 as described in the RI. Task Hazard Analyses (THAs) and safe-work zones for each field activity will be included as addendums to the HASP. FSPs will reference back to programmatic plans to the extent practicable. Pre-RD Group recommends that AEDs not be used on the sampling vessels. Porewater sampling locations were proposed in the FSP to kick-start the dialogue with EPA (final locations were TBD in Work Plan). The Pre-RD Group noted that the FSPs match the AOC Work Plan with specific exceptions that were necessary or requested, including relocation of specific cores (e.g., RM11E) and proposed porewater stations that were TBD. EPA will advise Pre-RD Group regarding level of oversight during field sampling they are planning, as this may impact boat/equipment being used.
- Finalization of Plans: EPA is okay with annotated responses to comments, and then the Pre-RD Group will provide final red-line/strikeout document and a “clean” final document, once EPA comments have been addressed. EPA and the Pre-RD Group agreed to minimize exchange of document redlines through open communications. Tech-on-tech phone calls/meetings are encouraged by all parties to efficiently resolve EPA comments and Pre-RD Group questions.

- Permitting: The Pre-RD Group's position is no permits are required for this work, based on the CERCLA exemption, only notification of work. EPA will consult with the agencies for agreement on scope/protection. EPA will contact other governmental agencies regarding approval (i.e., NMFS); the Pre-RD Group will provide Davis Zhen with a draft letter on permit equivalency for EPA's approval and distribution to other agencies. EPA will coordinate communication with all appropriate resource agencies. Since Portland Harbor is considered "waters of the state," we do not need private access permission. There will be Notice to Mariners.
- Communication: Communication requests and deliverables will go through Ken Tyrrell and Davis Zhen, then they will pass information to respective party members. EPA is okay with Pre-RD Group asking Davis for communication to subcontractors regarding technical questions. EPA will respond in a timely manner to make sure that insurance issues are not a holdup on the field schedule.

#### Pre-RD Group Action Items

- Pre-RD Group send to EPA:
  - PowerPoint from February 7, 2018, Meeting (remove "Draft")
  - Meeting notes from February 7, 2018, Meeting
  - Permit equivalency letter for Davis Zhen to email to affected agencies (NMFS)
- Bathymetry FSP (response to comments due to EPA on 2/16/18)
  - Send letter documenting Pre-RD Group response to comments
  - Follow up letter with redline and "clean" versions of the Bathymetry FSP
- HASP (response to comments due to EPA on 2/22/18)
  - Send letter documenting Pre-RD Group response to comments
  - Follow up letter with redline version and "clean" version of the HASP
  - HASP is for EPA review, but the Pre-RD Group does not require EPA approval
- THAs should be made available to EPA at least 1 week prior to field work for each associated field task

#### EPA Action Items

- Continue reviewing and providing comments/questions regarding remaining FSPs to meet agreed upon deadlines.
- EPA will submit DQMP to Pre-RD Group with comments on or by Monday, February 12, 2018
- EPA will submit QAPP to Pre-RD during the week of February 12, 2018
- Provide feedback as soon as possible on equipment/design for critical path studies with long lead times, including fish acoustic tracking and sediment trap

## 2018 PDI Project Plan Review/Approval Schedule

PDI Project Plan	Submitted Draft to EPA	EPA Comments Due (30 days)	Goal for Resubmit to EPA	Approvals Needed
Bathymetry Survey FSP	1/8/18	Rec'd 1/26/18	2/16/18	2/20/18
HASP	1/12/18	Rec'd 1/31/18	2/22/18	NA
DQMP	1/18/18	2/18/18	2/23/18*	2/26/18*
QAPP	1/18/18	2/18/18	3/12/18	3/19/18
Surface Water/ Sediment Trap FSP	1/18/18	2/18/18	3/12/18	3/19/18
Surface Sediment FSP	1/18/18	2/18/18	3/20/18	3/29/18
Acoustic Fish Tracking FSP	1/18/18	2/18/18	3/20/18	3/29/18
Sediment Coring FSP	1/18/18	2/18/18	3/20/18	3/29/18
Fish Tissue Sampling FSP	1/18/18	2/18/18	3/20/18	3/29/18
Porewater Sampling FSP	1/18/18	2/18/18	3/20/18	3/29/18

\* Early submittal to DQMP for Bathy FSP (remaining DQMP will cycle with Surface Water FSP)